



## U.S. Department of Justice

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

**MEMORANDUM ENDORSED**

June 30, 2023

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**VIA ECF**

The Honorable Gregory H. Woods  
United States District Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Dupont, et al.*, 23 Cr. 320 (GHW)**

Dear Judge Woods:

The Government respectfully writes on behalf of itself and defendants Stanley Kaplan (“Kaplan”) and Paul Feldman (“Feldman” and, together, the “defendants”) to request a modification of each defendant’s respective bail conditions. On or about June 29, 2023, the defendants were arrested, and Your Honor referred the defendants’ presentments and arraignments to the Honorable Sarah L. Cave, United States Magistrate Judge for the Southern District of New York. On consent of the parties, Judge Cave entered agreed-upon bail conditions that included, in substance, the following restriction: “Defendant not to contact co-defendants unless in the presence of counsel.” Given that the defendants are employed in the same medical facility and may be required to communicate with each other within the scope of their employment, the Government and each of the defendants request that the Court eliminate this bail condition for each defendant and instead include the following: “Defendant not to engage in any substantive case discussions with any co-defendants unless in the presence of counsel.”

With respect to Kaplan only, Judge Cave entered in the written bail disposition sheet a condition that was not otherwise set forth in Judge Cave’s oral pronouncement, nor was it recommended by Pretrial Services or the parties, namely, the requirement that Kaplan maintain or actively seek employment. The Government and Kaplan respectfully request that the Court eliminate this bail condition as unnecessary in the particular circumstances of this defendant and case under 18 U.S.C. § 3142(c)(1)(B) (advising that the judicial officer order pretrial release “subject to the least restrictive . . . condition, or combination of conditions, that such judicial officer determines will reasonably assure the appearance of the person as required”). Kaplan further requests that his travel conditions be enlarged to permit him to travel to the District of Massachusetts for purposes of visiting his in-laws. The Government has no objection to that amendment.

  
GREGORY H. WOODS  
United States District Judge